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6
7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8
9 United States of America,

10 Plaintiff,

11 v.

12 PCPLV LLC d/b/a Pinnacle Compounding
13 Pharmacy, Ofir Ventura, Cecelia Ventura,
14 Brandon Jimenez, Robert Gomez, Gomez
& Associates, Inc., Rock'n Rob
15 Enterprises, Amir Shalev, D.P.M., AS
Enterprises, Inc., and Ivan Lee Goldsmith,
16 M.D.,

17 Defendants.
18

Case No. 2:21-cv-00184-JCM-DJA

**JOINT MOTION
FOR EXTENSION OF TIME**

(FOURTH REQUEST)

19 Plaintiff UNITED STATES OF AMERICA and Defendants PCPLV LLC, OFIR
20 VENTURA, CECELIA VENTURA, and BRANDON JIMENEZ ("Defendants"), by and through
21 their counsel, hereby jointly move the Court to extend the time for Defendants to file an answer or
22 other responsive pleading to Plaintiff's complaint by an additional 14 days. This is the fourth
23 request to extend this deadline and is based on the following: On October 3, 2023, this Court
24 extended by 60 days, up through and including January 26, 2024, Defendants' time to file an
25 answer or other responsive pleading to Plaintiff's complaint. This was the first extension of time
26 of this deadline.
27
28

- 1 1. The Court subsequently, on the parties' joint motion, extended the January 26 deadline
2 by an additional 21 days, up through and including February 16, 2024. The parties
3 requested this extension to aid their ongoing settlement discussions.
- 4 2. The Court subsequently, on the parties' joint motion, extended the February 16
5 deadline by an additional 14 days, up through and including March 1, 2024.
- 6 3. The parties have spent the past two weeks continuing settlement discussions in earnest.
7 Given the significant progress that has been made during that time, the parties believe
8 there is a very good chance that a settlement in principle can be reached in this matter
9 within the next week. The parties believe that a brief extension of the responsive
10 pleading deadline will significantly increase the likelihood of a settlement being
11 reached.
12

13 DATED: March 1, 2024

Respectfully submitted,

15 BY: /s/ Peter S. Christiansen
16 PETER S. CHRISTIANSEN, ESQ.
17 Attorney for Defendants PCPLV LLC,
 OFIR VENTURA, and CECELIA VENTURA

18 BY: /s/ Michael V. Cristalli
19 MICHAEL V. CRISTALLI, ESQ.
 Attorney for Defendant BRANDON JIMENEZ

20 BY: /s/ Summer A. Johnson
21 SUMMER A. JOHNSON
22 Assistant United States Attorney
 Attorney for Plaintiff UNITED STATES

23 **IT IS SO ORDERED:**

24 

25 _____
26 **DANIEL J. ALBREGTS**
27 **UNITED STATES MAGISTRATE JUDGE**

28 **DATED:** 3/4/2024

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 1st day of March 2024, I caused a true and correct copy of **JOINT MOTION FOR EXTENSION OF TIME (FOURTH REQUEST)** to be served via the Court's CM/ECF system, on all parties currently on the electronic service list.

/s/ Tanya Bain